IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE NAMENDA DIRECT PURCHASER ANTITRUST LITIGATION

Case No. 1:15-cv-07488-CM-RWL

THIS DOCUMENT RELATES TO:

All Direct Purchaser Actions

NOTICE OF DIRECT PURCHASER CLASS PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF PROPOSED SETTLEMENT, APPROVAL OF THE FORM AND MANNER OF NOTICE TO THE CLASS AND PROPOSED SCHEDULE FOR A FAIRNESS HEARING

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Declaration of Bruce E. Gerstein, and exhibits attached thereto, Direct Purchaser Class Plaintiffs hereby move for the entry of the Preliminary Approval Order proposed herewith, which provides for: preliminary approval of a proposed Settlement Agreement; approval of a proposed Escrow Agreement; approval of the proposed form and manner of notice to the Direct Purchaser Class; and the establishment of a proposed schedule leading up to and including the Fairness Hearing.

Dated: December 24, 2019 Respectfully Submitted:

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CERTIFICATE OF SERVICE

I hereby certify that on December 24, 2019, I electronically filed the above by CM/ECF system.

Respectfully submitted,

/s/ Bruce E. Gerstein
Bruce E. Gerstein